

EXHIBIT H

Anthony Ray Russ, Sr.
 IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF GEORGIA
 ATLANTA DIVISION

ROBERT WEINTRAUB, as)	
Natural Parent and)	
Surviving Heir of WILLIAM)	
WEINTRAUB, deceased, and)	
as Administrator of the)	Civil Action
ESTATE OF WILLIAM)	File No.
WEINTRAUB,)	1:15-CV-01213-AT
)	
Plaintiffs,)	
)	
-v-)	
)	
ADVANCED CORRECTIONAL)	
HEALTHCARE, INC., a)	
foreign corporation, and)	
PTS of AMERICA, LLC, a)	
foreign limited liability)	
corporation,)	
)	
Defendants.)	

The videotaped deposition upon oral examination of ANTHONY RAY RUSS, SR., a witness produced and sworn before me, Sherry D. Lenn, RPR, and Notary Public in and for the County of Warrick, State of Indiana, taken on behalf of the Plaintiffs at the Le Merigot Hotel, 615 N.W. Riverside Drive, Evansville, Indiana, on April 15, 2016 at 1:30 p.m., pursuant to the Federal Rules of Civil Procedure.

Job No. 104938

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2 you know, like wet. And, you know, so --

3 Q Did he look right to you?

4 A No, he didn't look right at all. And I -- you
5 know, I just couldn't understand why they hadn't
6 sent the guy out to the hospital to be checked out
7 like they do with anybody that they --

8 Q Had you observed before patients with things like
9 this getting referred out to the ER?

10 A Oh, yeah. We -- you know, we sent -- it seemed
11 like it was every other day we'd sent one -- one of
12 the PTS prisoners out to the hospital. And a lot
13 of the cases they were just making up, you know,
14 something to try to stay there and not be shipped
15 off to whatever jail they were going to be taken to
16 next or dropped off to next. But you can ignore --
17 you know, if you ignore it and there's something
18 really radically wrong with them or wrong with
19 them, he's got to be treated whether he's a
20 prisoner or not.

21 Q Well, was it hard -- I mean, can you give us an
22 idea of the obvious -- and your hands are back up.

23 A Oh, I'm sorry.

24 Q That's okay. Can you give us an idea -- I mean,
25 was it obvious the guy -- to you -- would anybody

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2 have to really come study him closely to tell
3 something was off?

4 MS. INSLEY: Object to form, leading.

5 MR. CONLEY: I'll rephrase it.

6 Q Did it -- was it readily apparent or observable to
7 you the conditions you've described?

8 A His color wasn't right at all. He was pale. He
9 was what we call cold and clammy, and, you know, it
10 just wasn't right. And I just could not understand
11 -- you know, I've seen guys sent out for a lot less
12 than -- than what he was sent out for --

13 MS. INSLEY: Object to form.

14 A -- or what he should have been sent out for.

15 MS. INSLEY: Excuse me. Object to form,
16 responsiveness. It's nonresponsive.

17 Q Are you -- do you have a clear memory of Mary, the
18 nurse, saying maybe this will shut him up?

19 A Yeah.

20 MS. INSLEY: Object to form, leading.

21 Q Is the testimony you've given today about what you
22 recall the nurse Mary saying to you clear in your
23 mind?

24 A Yes.

25 Q During this -- during the period from when you